



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

SEP 30 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Dr. Philip X. Masciantonio  
Vice President, Environment & Energy  
U.S. Steel Corp.  
600 Grant Street  
Pittsburgh, PA 15230

Re: Notification to Terminate Interim Status  
Facility Name: U.S. Steel Corp. - USS Chemical Div.  
EPA I.D. Number: PAD 00 082 4730

Dear Mr. Masciantonio:

Enclosed is the notification of interim status termination for the above referenced facility. This action is in accordance with your request to withdraw the Part A application and to terminate the interim status of your facility. This notification constitutes a final permit decision under Title 40, Code of Federal Regulations Section 124.15 (45 CFR 33490, May 19, 1980).

This decision to terminate interim status does not relieve you of your responsibilities, under RCRA, for closure of the facility. If closure is required, the administrative procedures for closure must begin immediately.

Your Part A application is enclosed if it was not previously returned to you. If you have any questions regarding this notification or your responsibilities under RCRA, please contact Ms. Joan Henry at the letterhead address or you may telephone her at (215) 597-8751.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Stephen R. Wassersug".

Stephen R. Wassersug, Director  
Air & Waste Management Division

Enclosure

SEP 30 1983

NOTICE OF TERMINATION OF INTERIM STATUS

Office Issuing This Notice:

U.S. Environmental Protection Agency  
Region III  
6th & Walnut Streets  
Philadelphia, PA 19106

Name and Address of Permittee:

Dr. Philip X. Masciantonio  
Vice President, Environment & Energy  
U.S. Steel Corp.  
600 Grant Street  
Pittsburgh, PA 15230

Name and Address of Facility:

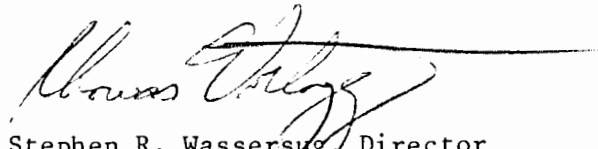
U.S. Steel Corp. - USS Chemical Div.  
Neville Island Plant  
Neville Island, PA 15225

EPA I.D. No.

PAD 00 082 4730

Description of Facility and Action: The above facility has, since November 19, 1980, operated a hazardous waste management facility subject to regulations promulgated under the Resource Conservation and Recovery Act. This facility qualified for interim status, which is conferred by the Act and allows a facility to operate until final disposition of its permit application. On September 2, 1982, EPA requested from this facility its complete permit application. By letter of March 3, 1983, the facility indicated that it would no longer operate as a hazardous waste management facility so would not be submitting the permit application. EPA followed the Public Notification procedures outlined in 40 C.F.R. Part 124 in taking this final permit action. No public comments were received during the public comment period.

The action finalized by this notice is the termination of interim status for this facility by authority of regulation 40 C.F.R. §§270.10(e)(5) and 270.73. Upon termination of interim status, this facility is prohibited from operating as a hazardous waste management facility.



Stephen R. Wassersug, Director  
Air & Waste Management Division

NOTICE OF INTENT TO TERMINATE INTERIM STATUS

7/21/83

Office Issuing This Notice:

U.S. Environmental Protection Agency  
Region III  
6th & Walnut Streets  
Philadelphia, Pennsylvania 19106  
ATTN: (3AW32)

Name and Address of Permittee:

USS Chemical Division U.S. Steel  
600 Grant Street  
Pittsburgh, Pa. 15230

Name and Address of Facility:

US Steel Corp., USS Chemicals Div.  
Neville Island Plant  
Neville Island, Pa. 15225

EPA I.D. No.

PAD000824730

Description of Facility and Proposed Action: The above facility has, since November 19, 1980, operated a hazardous waste management facility subject to regulations promulgated under the Resource Conservation and Recovery Act. This facility qualified for interim status, which is conferred by the Act and allows a facility to operate until final disposition of its permit application. On September 2, 1982 EPA requested from this facility its complete permit application. By letter of March 3, 1983 the facility indicated that it would no longer operate as a hazardous waste management facility so would not be submitting the permit application. The action proposed by this notice is the termination of interim status for this facility by authority of regulation 40 C.F.R. §§ 270.10(e)(5) and 270.73. Upon termination of interim status, this facility is prohibited from operating as a hazardous waste management facility.

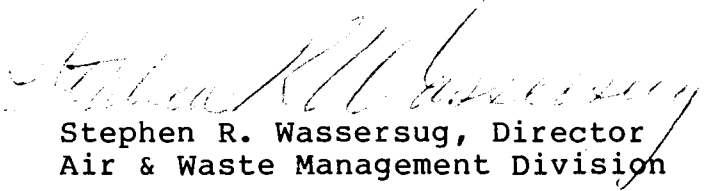
Availability of Information: All data submitted by the applicant and all related information is available as part of the administrative record. It may be inspected and arrangements made for copying at the EPA offices at the above address at any time between 9:00 A.M. and 4:00 P.M., Monday through Friday. For further information please contact Shirley Bulkin at (215) 597-4269.

Procedures for Public Participation: On the basis of its review of this facility's permit file, EPA proposes to terminate the facility's interim status. Persons wishing to comment on this proposed action are invited to submit a statement to the Director of the Air and Waste Management Division within 60 days from the date of this notice. All comments should include the name, address and telephone number of the writer and a concise statement of the basis of the comments and the facts upon which it is based. The comments may include a request for a public hearing on the proposed action and the nature of the issues proposed to be raised. If these comments relating to termination of interim status include a request for a public hearing, one will be held on this proposed action.

All comments received will be considered in the formulation of the final action in this matter. EPA's final action in this matter is subject to review under the evidentiary hearing procedures in 40 C.F.R. Part 124, Subpart E.

Address Comments To:

U.S. Environmental Protection Agency  
Director, Air & Waste Management Division (3AW22)  
6th & Walnut Streets  
Philadelphia, Pennsylvania 19106  
ATTN: Henry Sokolowski (3AW32)



Stephen R. Wassersug, Director  
Air & Waste Management Division

May 5, 1983

MAY 9 1983

SUBJECT: United States Steel  
Chemical Division  
Neville Island Plant  
Neville Township  
Allegheny County  
ID No. PAD000824730

TO: Gary Galida, Chief  
Division of Hazardous Waste Management  
Bureau of Solid Waste Management  
Central Office

Through: Tony Orlando, Chief  
Operations Section  
Bureau of Solid Waste Mgmt.  
Southwestern Region

FROM: Daniel F. Peterson  
Solid Waste Specialist  
Bureau of Solid Waste Management  
Southwestern Region

We have received an amended Part A Application and a notification of hazardous waste activity from U.S. Steel Corporation indicating that they no longer intend to have a storage facility at their U.S.S. Chemicals Neville Island Plant.

During our most recent inspection (2-4-83), they indicated to us that they had stopped purchasing light ends from Koppers Company and had been using the same tank for storage of the same material which is also generated at their facility.

I feel we can agree to delist U.S.S. Chemical Company, Neville Island Plant as a storage facility as they have requested. They will be required to meet all requirements for a generator who accumulates in tanks.

We request your comments on this matter.

DFP/ksw

cc: Regional File  
Chron  
Tony Orlando - Operations

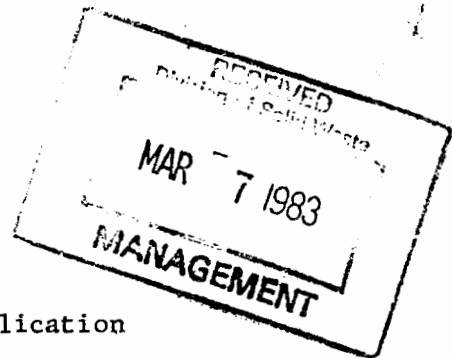


RICHARD DWOREK  
DIRECTOR—ENVIRONMENT  
ENVIRONMENT & ENERGY

125 JAMISON LANE  
MONROEVILLE, PENNSYLVANIA 15146  
412/372-1212, EXT. 2219

March 3, 1983

Pennsylvania Dept. of Environmental Resources  
Division of Hazardous Waste  
Kossman Building  
Pittsburgh, Pennsylvania 15230



Re: Storage Facility Closure Application  
USSC Neville Island Plant  
U.S. EPA ID No. PAD 000824730

Gentlemen:

The USS Chemicals Neville Island Plant, having interim status as a storage facility for purchased phthalic anhydride distillation light-ends (K023) will not be submitting a TSD Part B application for permanent status. The Neville Island Plant has discontinued purchasing and refining this hazardous waste and is requesting closure approval of the storage activity. Please find attached a completed Pennsylvania DER Notification of Hazardous Waste Activity form and an updated U.S. EPA Part A permit application showing the deletion of the storage activity.

The closure of the on-site storage facility for the purchased light-ends does not incur any hazardous waste disposal, closure costs or post-closure liability. All of the purchased waste has been removed from the tank and processed in the plant refinery. The holding tank which had received the purchased light-ends is still in use. Light-ends generated from the Neville Island phthalic anhydride refinery are continually accumulated in this tank prior to batch recycling every four to five weeks. The storage of the Neville Island light-ends is therefore exempted from permitting by the 90-day storage provision.

Please advise what additional steps are required to obtain official closure of the Neville Island storage activity for purchased light-ends waste.

Very truly yours

A. A. Spinola  
Senior Environment Engineer

AAS/nmh  
Attachment

MAY 3 1983

BUREAU OF SOLID WASTE MANAGEMENT  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

ER-SWM-53; Rev. 3/82

MAY 9 1983

<b>I INSTALLATION'S EPA I.D. NUMBER</b>															
P	A	D	0	0	0	8	2	4	7	3	0				
<b>II NAME OF INSTALLATION</b>															
USS CHEMICALS															
<b>III INSTALLATION MAILING ADDRESS</b>															
STREET OR P. O. BOX															
NEVILLE ISLAND PLANT															
CITY OR TOWN												ST.	ZIP CODE		
PITTSBURGH												PA	15225		
<b>IV LOCATION OF INSTALLATION</b>															
STREET OR ROUTE NUMBER												MUNICIPALITY			
SAME															
CITY OR TOWN												ST.	ZIP CODE	COUNTY	
SAME												PA	15225	ALLEGHENY	
<b>V INSTALLATION CONTACT</b>															
NAME AND TITLE (last, first, & job title)												PHONE NO. (area code & no.)			
SEROKIS, PETER M., PLANT MANAGER												412 771 6200			
<b>VI OWNERSHIP</b>															
<b>A. NAME OF INSTALLATION'S LEGAL OWNER</b>															
UNITED STATES STEEL CORPORATION															
<b>B. TYPE OF OWNERSHIP</b>															
(enter the appropriate letter into box)															
F = FEDERAL    M = NON-FEDERAL <span style="border: 1px solid black; padding: 2px 5px;">M</span>															
<b>VII SIC CODES (4-digit in order of priority)</b>															
<b>A. FIRST</b>										<b>C. THIRD</b>					
2	8	1	8	(specify) INDUSTRIAL ORGANIC CHEMICALS							(specify)				
<b>B. SECOND</b>										<b>D. FOURTH</b>					
(specify)										(specify)					
<b>VIII TYPE OF HAZARDOUS WASTE ACTIVITY</b>															
<input checked="" type="checkbox"/> <b>A. GENERATION</b> <input type="checkbox"/> <b>C. STORE</b> <input type="checkbox"/> <b>E. TRANSPORTATION (COMPLETE ITEM IX)</b> <input checked="" type="checkbox"/> <b>G. REUSE, RECYCLE, RECLAIM</b> <input type="checkbox"/> <b>B. TREAT</b> <input type="checkbox"/> <b>D. DISPOSE</b> <input checked="" type="checkbox"/> <b>F. PERMIT BY RULE</b> <input type="checkbox"/> <b>H. OTHER (specify):</b>															
<b>IX MODE OF TRANSPORTATION (transporters only)</b>															
<input type="checkbox"/> <b>A. AIR</b> <input type="checkbox"/> <b>B. RAIL</b> <input type="checkbox"/> <b>C. HIGHWAY</b> <input type="checkbox"/> <b>D. WATER</b> <input type="checkbox"/> <b>E. OTHER (specify):</b>															
<b>X EXISTING ENVIRONMENTAL PROGRAM PERMITS</b>															
<b>A. NPDES (Discharges to Surface Water)</b>										<b>D. PSD (Air Emissions from Proposed Sources)</b>					
0	0	0	3	8	3	2									
<b>B. UIC (Underground Injection of Fluids)</b>										<b>E. SOLID WASTE</b>					
<b>C. RCRA (Hazardous Wastes)</b>										<b>F. OTHER</b>					
										(specify)					
										SEE ATTACHED					
<b>XI. TYPE OF NOTIFICATION</b>															
Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).															
<input type="checkbox"/> <b>A. FIRST NOTIFICATION</b> <input type="checkbox"/> <b>C. DELETION OF A WASTE</b> <input checked="" type="checkbox"/> <b>E. DELETION OF AN ACTIVITY</b> <input type="checkbox"/> <b>B. CHANGE OF GENERAL INFORMATION</b> <input type="checkbox"/> <b>D. ADDITION OF A WASTE</b> <input type="checkbox"/> <b>F. ADDITION OF AN ACTIVITY</b>															

**XII DESCRIPTION OF HAZARDOUS WASTES (Continued from front)**

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from §75.261(h)(2) for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1	2 F 0 0 2	3 D 0 0 1	4 D 0 0 2	5	6
7	8	9	10	11	12

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from §75.261(h)(3) each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K 0 2 3	14 K 0 2 4	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from §75.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 0 3 1	32 U 1 6 6	33 U 1 4 7	34 U 1 6 5	35 U 0 2 8	36 U 1 9 0
37 U 0 6 9	38 U 0 1 9	39	40	41	42
43	44	45	46	47	48

**D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See §75.261(g)(2) through (5))

☐ 1. IGNITABLE

☐ 2. CORROSIVE

☐ 3. REACTIVE

☐ 4. EP TOXIC

**XIII CERTIFICATION**

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

*P. X. Masciantonio*

NAME and OFFICIAL TITLE (Type or Print)

P. X. Masciantonio, Vice President  
Environment & Energy

DATE SIGNED

3-1-83

FOR OFFICIAL USE ONLY

PA. DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF SOLID WASTE MANAGEMENT

## NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

MAY 9 1983

Form ER-SWM-53: Rev. 3/82

Section X - Existing Environmental Program Permits

Part F - Other

Operating Permits Issued By: Allegheny County Health Department  
Bureau Of Air Pollution Control  
Allegheny County, Pennsylvania

<u>PERMIT NUMBER</u>	<u>EQUIPMENT</u>
7035003 013 00900	Steam Boiler
7035003 013 31300	Benzene Storage Tank
7035003 013 28700	Fumaric Acid Reactor
7035003 013 76201	Resin Plasticizer Production - Train No. 4
7035003 013 76202	Resin Plasticizer Production - Train No. 2
7035003 013 76203	Resin Plasticizer Production - Train No. 1
7035003 013 76204	Resin Plasticizer Production - Train No. 3
7035003 013 76205	Polyester Resins Plant
7035003 013 98600	Fluid Bed Chemical Reactor - Phthalic Anhydride
7035003 013 99701	Waste Gas Oxidizer - Maleic Anhydride No. 1,2,3
7035003 013 99702	Waste Gas Oxidizer - Maleic Anhydride No. 4

3/11/83

REQUEST FOR WITHDRAWAL FROM INTERIM STATUS

FACILITY NAME W.S. Steel Corp - Neville Is. Plt.

FACILITY I.D. NO. PAD 00 082 4730

CHECKLIST

- yes Part B Called In?  
\_\_\_\_ Submit closure plan for review?  
\_\_\_\_ Go through proper closure/post closure  
✓ Approved? yes  
✓ Claims corroborated by State EPA inspection?  
✓ Additional future inspections required? as generator

WITHDRAWAL APPROVED William L. Walsh Date 5-24-83  
Signature

See 5-18-83 letter from PA DER's Gayle Leader.

W/D

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.  
Philadelphia, Pa. 19106

**SUBJECT:** RCRA Inspection - U.S. Steel Chemical  
Neville Island  
PAD 00 082 4730

**DATE:** APR 1 1983

**FROM:** James N. Webb  
Environmental Engineer (3AW22)

**TO:** File

**THRU:** Walter Lee  
Chief, Waste Enforcement Section (3AW22)

THE STATE IS TAKING ACTION TO RESOLVE THE VIOLATIONS IN THIS  
INSPECTION REPORT.

WE WILL MONITOR THE STATE ACTIVITY REGARDING RESOLUTION OF  
THESE VIOLATIONS.

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION III

Western Regional Laboratory & Environmental Center  
303 Methodist Bldg., 11th & Chapline Streets  
Wheeling, West Virginia 26003

DATE: 3/2/83

SUBJECT: RCRA Inspection Reports: U.S. Steel Corp., Irvin Plant; Calgon Carbon Corp.,  
Neville Island; U.S. Steel Chemical, Neville Island

FROM: Gary V. Bryant, Acting Chief *GB*  
Wheeling Field Section (3ES13)

TO: Dr. Walter Lee, Chief  
Superfund/RCRA Compliance Section (3AW23)

THRU: Robert Kramer, Acting Chief *RK*  
Environmental Programs Branch (3ES10)

Attached are three trip reports of overview inspections for RCRA. The  
attached reports are as follows:

U.S. Steel Chemical, Neville Island  
PAD 000824730  
Inspected - February 4, 1983

Calgon Carbon Corporation, Neville Island  
PAD 000736442  
Inspected - February 10, 1983

U.S. Steel Corporation, Irvin Plant  
PAD 004379061  
Inspected - February 14, 1983

All three were done by the Pittsburgh Region staff of PA DER. We accompanied them to observe and learn how the Pittsburgh DER staff conducts inspections. State inspections are somewhat different than EPA's inspections, especially in areas such as reporting forms. The State inspector tried to foster a spirit of cooperation from the permittee and work with them to achieve compliance. At the same time the State inspector employs enforcement techniques to achieve compliance. An example is the U.S. Steel-Irvin Plant's lack of containment around the spent acid storage tanks. The State will issue a NOV, but offers to meet with U.S. Steel to describe what would be required and review plans before construction begins.

Please contact us if you have questions or comments on these reports.

Attachments

cc: Charles Deritsa, PA DER w/attachments

**RECEIVED**

MAR 08 1983

AIR MONITORING  
SECTION (3ES12)

U.S. ENVIRONMENTAL PROTECTION AGENCY  
REGION III

Western Regional Laboratory & Environmental Center  
303 Methodist Bldg., 11th & Chapline Streets  
Wheeling, West Virginia 26003

DATE: 2/16/83

SUBJECT: Trip Report - Overview of Pennsylvania DER Resources Conservation and Recovery Act Inspection

FROM: James L. Bailey, Engineering Technician *JB*  
Water Unit, Wheeling Field Section (3ES13)

TO: Gary V. Bryant, Acting Chief  
Wheeling Field Section (3ES13)

Date of Trip: February 4, 1983

Place visited: United States Steel Chemicals  
Nevelle Island Plant

Persons contacted: USS Chemical  
Eugene R. Fluharty, Chief Engineer  
Theodor Fusco, Environmental Engineer

PA DER  
Daniel F. Peterson, Bureau of Solid Waste Mgmt.

U.S. Steel Chemical, PAD000824730 initially filed as a generator, storage facility, treatment facility (recycle and recovery) and disposer utilizing incineration.

In addition to the waste generated on site, 40,000 pounds of phthalic anhydride per month was received from the Koppers facility in Bridgeville, PA. The phthalic anhydride was re-distilled to recover usable products. The residue was incinerated at an average rate of 2800 pounds per day.

For various reasons, primarily economic, U.S.S. Chemical has ceased to be a TSD facility, and they no longer receive waste from off-site.

The following hazardous wastes and types of hazardous wastes, by hazardous waste number are generated at the U.S.S. Chemical, Nevelle Island Plant.

D002, Maleic and fumaric acids  
K024 Phthalic anhydride distillation bottoms  
K023  
U147  
U190  
U165  
U028  
U022  
U013  
F001  
F002  
F003

All hazardous waste material is transported by permitted transporters, in less than ninety days, to permitted TSD facilities.

The pH of waste acid is raised above 2.0 before shipment according to Mr. Fusco.

Recommendations made by Dan Peterson:

1. Amend Part A to show U.S.S. Chemical is no longer a storage facility.
2. P.A. Distillation Bottoms is shipped to MIDS for storage then shipped to Carrie furnace where it is used as a fuel supplement. This shipment, storage and shipment is now covered by one manifest. According to State regulations, one manifest must be used from U.S.S. Chemical to MIDC, and a separate manifest from MIDC to Carrie Furnace.

3. Some manifests copies from MIDC have exceeded the 45 day turn around time. U.S.S. Chemical was asked to do what they could to alleviate this.

One item covered during the inspection was not resolved on site, that was the use of primary neutralization of Fumaric Acid, then transported as a corrosive (not a hazardous waste) to the Clairton Works where it is run through a Biological Treatment Plant.

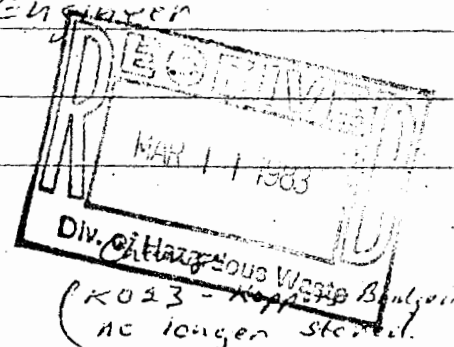
Dan Peterson was to recheck applicable State regulations to determine the legality of procedure in use and make appropriate recommendations if required.

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part A

3-1583  
Date of inspection February 4, 1983 Time start 9:55 AM Time finish \_\_\_\_\_  
Name of inspector DANIEL F. PETERSON, JAMES L. Bailey (USEPA)  
Company, installation name USS Chemical, Neville Island  
Location Neville Island  
County Allegheny Municipality Neville Twp.  
Identification number PAD000824730  
Name of responsible official Peter Serenis  
Title PLANT Manager  
Mailing address USS Chemical Co. Neville Is Plant, Neville Island PA 152  
Area code and phone no. 412-771-6200  
Name of person interviewed TED Fusco / GENE Flaherty  
Title ENVIRONMENTAL Engineer / Chief Engineer  
Mailing address (if different from above) SAME  
Area code and phone no. SAME

1. Current waste handling method:

- (Primary Neutralization)
- a. ☒ On-site ☒ treatment ☐ storage, ☐ disposal  
b. ☐ On-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim  
c. ☒ Off-site ☐ treatment, ☒ storage, ☒ disposal  
d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim



2. Amount of hazardous waste produced:

- a. \_\_\_\_\_ kg./mo. 200 T/MO. PHTHALIC ANHYDRIDE STILL BOTTOMS.  
b. \_\_\_\_\_ kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number:

<u>0002 Maleic Acid &amp; Fumaric Acid</u>	<u>K023</u>	<u>F002</u>	<u>F001</u>
<u>K024 P.A. Distillation Bottoms</u>	<u>4147</u>	<u>U028</u>	<u>F003</u>
<u>4165</u>	<u>4190</u>	<u>U022</u>	<u>U013</u>

4. Do hazardous waste transported off-site by the generator? ☒ Yes ☐ No

Chemical Waste Mgmt. (use Nitrex)

Alchemetron

Amo Pollution Services

Chem. Waste

Manfredi

Matlack

McKesson Envir. Systems

MIDL

Ecology Chem. Res

Facility Name USS Chemical  
 I. 0AD000824730  
 Date 2-4-83

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

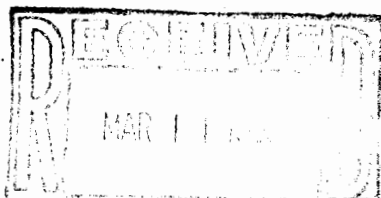
RECEIVED  
MAR 11 1983  
Div. of Hazardous Waste

Date of inspection 2-4-83 Identification number PAD  
 Company, Installation name USS Neville Island  
 County Allegheny Municipality Neville Twp.

- Your PART A should be amended to show deletion of your storage facility.

e(2) - PA Distillation Bottoms shipped to MIDC for storage should be manifested to MIDC - not Carrie Furnace.

(Letter indicating this was sent to Mr Fiore of MIDC and cc to Mr Fusco. 2-28-83 JH)



This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be forthcoming, notifying any violations indicated herein and listing any additional violations.

Area interviewed (if pertinent) Theodore M Fusco Date 2-4-83  
 Inspector (signature) Daniel J. Petersen Date 2-4-83



*Bill's copy*

(2)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
6TH AND WALNUT STREETS  
PHILADELPHIA, PENNSYLVANIA 19106

MAR 29 1983

Mr. Richard Shipman  
Pa. Department of Environmental Resources  
Div. of Hazardous Waste Management  
Compliance Section  
P.O. Box 2063  
Harrisburg, PA 17120

Dear Rick:

As I have explained in several of our phone conversations, I will be sending you updates of my earlier letter. The attached group of Part A withdrawals will need to be checked for verification of their claims and compliance with all applicable requirements. Those facilities which have had their Part B called in by EPA Region III will again be marked with an asterisk (\*). The list is broken down by your state's six regions.

Your cooperation is greatly appreciated and we hope to hear from you soon.

Sincerely yours,

*William L. Walsh*

William L. Walsh  
Waste Enforcement Section

Enclosure

cc: Shirley Bulkin (3AW32)  
Greg Koltonuk (3AW22)  
Jim Webb (3AW22)



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF SOLID WASTE MANAGEMENT

851 Kossman Building  
100 Forbes Avenue  
Pittsburgh, Pennsylvania 15222-1376 (412) 565-5023



March 11, 1983

U.S.S. Chemical Company  
Neville Island Plant  
Neville Island, PA 15224

Attention: Theodore Fusco  
Environmental Engineer



RE: ID No. PAD000824730  
U.S.S. Chemical Company  
Neville Township  
Allegheny County

Dear Sir:

Enclosed are two copies of your TSD facility inspection report and a copy of our memo concerning the permit by rule provision of the hazardous waste regulations of the Pennsylvania DER. Please sign one copy of the inspection report and return it to my office.

I am aware of your notification to delete your storage facility at this site.

If you have any comments or questions, please contact me at the above address.

Sincerely,

Daniel F. Peterson  
Solid Waste Specialist  
Bureau of Solid Waste Management

DFP:bk

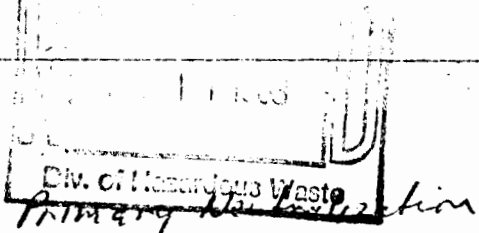
Enclosure

cc: ~~Central~~ File  
Regional File  
Chron  
Operations Section

HAZARDOUS WASTE INSPECTION REPORT  
TSD Facilities - Part A

CE 1583  
3-15-83  
Date of inspection February 4, 1983 Time start 9:55 AM Time finish \_\_\_\_\_  
Name of inspector DAN PETERSON, Jim Bailey (USEPA)  
Company, installation name USS Chemical, Neville Island  
Location Neville Island  
County Allegheny Municipality Neville Twp.  
Identification number PAD 000824730  
Name of responsible official Peter SEROKIS  
Title Plant Manager  
Mailing address USS Chemical Co, Neville Is. Plant, Neville Is., PA 15222  
Area code and phone no. (412) 771-6200  
Name of person interviewed Eugene Flukerty / TED Fusco  
Title Chief Engineer / ENVIRONMENTAL  
Mailing address (if different from above) SAME  
Area code and phone no. SAME

1. Site characterization:

-   
a. ☒ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ biological  
b. ☐ Storage - ☐ containers, ☐ tanks, ☐ surface impoundments, ☐ waste piles  
c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal treatment  
d. ☐ Use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Does the facility generate hazardous wastes? ☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste Number:

Primary Neutralization - Fumaric Acid Waste water.

WASTES GENERATED - SEE GENERATOR INSR Rep

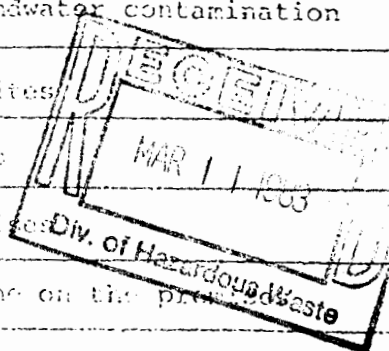
4. Are hazardous wastes transported off-site by the facility? ☐ Yes ☒ No

1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
	X			Part A permit application submitted	(a) (2), (
	X			Identification number	(b)
	X			Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department	(b) (1)
		X		Waste streams not covered by permit approved by the Department before acceptance	(c)
	X			Chemical and physical analyses repeated as required	(c) (1)
	X			All waste shipments inspected and sampled	(c) (2)
	X			Waste analysis plan on-site	(c) (3)
	X			24 hr. surveillance at active portion	(d) (2)
	X			Artificial barrier at active portion	(d) (2)
	X			Proper signs posted and legible at a distance of at least 25 ft.	(d) (3)
	X			Inspection schedule on-site (75.264 e)	(e) (2)
	X			Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction	(e) (4)
		X		Immediate remedial action taken where a hazard is imminent or has already occurred	(e) (4)
	X			On the job or classroom personnel training program	(f)
	X			Records retained for each employee at facility of training, job title, and job description	(f) (6)
	X			Ignitable or reactive wastes separated from source of ignition or reaction	(g) (1)
	X			No smoking signs displayed where there are hazards from ignitable or reactive wastes	(g) (1)
	X			Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	(g) (2)
	X			Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel	(h) (2)
	X			Facility equipped with a device for surviving outside emergency assistance	(h) (2)
	X			Facility equipped with fire control, spill control, and decontamination equipment	(h) (2)
	X			Facility equipped with water at adequate volume and pressure to supply fire control equipment	(h) (2)
	X			Facility communications or alarm system, fire control, spill control, and decontamination equipment tested and maintained	(h) (2)
	X			Adequate aisle space maintained to allow personnel and equipment during emergencies	(h) (2)
	X			Contingency plan on site and implemented	(i) (1)
	X			Contingency plan describes action taken personnel in the event of an emergency	(i) (1)

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
	X			Contingency plan contains an up-to-date list of names, addresses and phone numbers of all persons qualified to act as emergency coordinator.	(i) (6)
	X			Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	(i) (7)
	X			Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	(i) (8)
	X			One employee designated as the primary emergency coordinator either on the premises or on call.	(i) (1)
		X		Facility accepting only PA manifests	(j) (2)
X				Manifests properly completed and routed within time limits (24 hrs.)	(j) (2)
	X			Manifest discrepancies resolved or reported within time limits	(j) (1)
	X			Written operating record maintained on the premises	(k) (1)
	X			Written operating record contains description and quantity of wastes and method of treatment, storage or disposal <i>Use Quarterly Report Form</i>	(k) (2)
	X			Written operating record contains location and quantity of each hazardous waste	(k) (2)
	X			Written operating record contains results of waste analyses and treatability tests	(k) (2)
	X			Written operating record contains reports and details of all incidents	(k) (2)
	X			Written operating record contains records and results of all inspections	(k) (2)
	X			Written operating record contains required monitoring, testing, and analytical data	(k) (2)
	X			Written operating record contains closure and post-closure cost estimates	(k) (2)
	X			All records retained on premises and available for inspection	(l)
	X			Quarterly reports submitted to the Department	(m)
	X			Emissions, discharges, fires, explosions, and groundwater contamination reported as required	(n) (1)
		X		Groundwater monitoring wells located at approved sites	(n) (1)
		X		Adequate protection of groundwater monitoring wells	(n) (1)
		X		Groundwater sampling and analysis plan on the premises	(n) (1)
		X		Groundwater quality assessment and abatement outline on the premises	(n) (1)
	X			Closure plan on the premises and up-to-date	(o) (1)
		X		Post-closure plan on the premises and up-to-date	(o) (1)
	X			Annual closure cost estimate on the premises and up-to-date	(p) (1)
		X		Annual post-closure cost estimate on the premises and up-to-date	(p) (1)



75.265

Facility Name US-CHEMICAL  
Date 2-9-83

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
	X			Containers managed to prevent leaks and spills	(q) (1)
	X			Containers are compatible with waste stored.	(q) (2)
	X			Containers are closed during storage	(q) (3)
				Container storage area inspected weekly for leaks, deterioration, etc.	(q) (5)
	X			Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(q) (6)
	X			Satisfactory procedures followed for handling incompatible wastes.	(q) (7)
	X			Incompatible wastes separated or protected from other materials.	(q) (9)
	X			Containers and tanks labeled to identify accurately hazardous waste contained.	Act 9, Section 403
	X			Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(r) (2)
	X			Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(r) (3)
		X		Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(r) (4)
		X		Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(r) (4)
	X			Continuously fed tanks equipped with a means to stop the inflow.	(r) (5)
X				Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(r) (6)
		X		Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank. <i>(not required under 75.262(g)(1)(ii))</i>	(r) (7)
			X	Discharge control equipment inspected once each operating day.	(r) (8)
	X			Monitoring equipment data inspected once each operating day.	(r) (8)
		X		Liquid level of tanks inspected once each operating day.	(r) (8)
		X		Construction materials of tanks inspected weekly.	(r) (8)
	X			Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(r) (8)
	X			All hazardous waste removed from tanks and related appurtenances at closure.	(r) (9)
	X			Placement of ignitable or reactive waste only with the Department's approval	(r) (1)
	X			Covered tanks in which ignitable or reactive waste is treated or stored meet NFPA buffer zone requirements.	(r) (1)
	X			Precautions taken for handling ignitable, reactive or incompatible waste or material.	(r) (1)

HAZARDOUS WASTE INSPECTION REPORT  
Part C - Comments

Date of inspection 2-4-83 Identification number PAD 000824730  
Company, Installation name USS - Chemical  
County Allegheny Municipality Neville Twp

Primary Neutralization unit treats Fumaric Acid to raise pH. Treated Fumaric Acid is transported to Clairton Industrial Waste treatment Plant for final treatment. Clairton's NPDES Permit has been amended to show treated Fumaric Acid is taken there.

USS chemical PART A will be revised to show deletion of STORAGE

- 6,000 # tank used for storage of light ends from distillation of phthalic anhydride from Koppers now used for storage of same materials generated on site.

75.265(D)(2)(ii) PA Distillation Bottoms are now being manifested to WIDC (3-6-83)

This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. No findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of U.S. Environmental Protection Agency laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Upon first review (signature)

Date

Samuel J. Peterson

Date

2-28-83



United  
States  
Steel  
Corporation

125 JAMISON LANE  
MONROEVILLE, PENNSYLVANIA 15146  
412/372-1212, EXT. 2219

March 3, 1983

RICHARD DWOREK  
DIRECTOR—ENVIRONMENT  
ENVIRONMENT & ENERGY

U.S. Environmental Protection Agency  
Region III  
6th and Walnut Streets  
Philadelphia, Pennsylvania 19106

Re: Storage Facility Closure Notification  
USSC Neville Island Plant  
U.S. EPA ID No. PAD 000824730

Gentlemen:

The USS Chemicals Neville Island Plant, having interim status as a storage facility for purchased phthalic anhydride distillation light-ends (K023) will not be submitting a TSD Part B application for permanent status. The Neville Island Plant has discontinued purchasing and refining this hazardous waste and has applied to the Pennsylvania DER for closure of the storage facility. Attached please find a completed Pennsylvania DER Notification of Hazardous Waste Activity form and an updated U.S. EPA Part A permit application showing the deletion of the storage activity. These forms have been submitted to the Pennsylvania DER, Division of Hazardous Waste, Harrisburg, Pennsylvania.

The closure of the on-site storage facility for the purchased light-ends does not incur any hazardous waste disposal, closure costs or post-closure liability. All of the purchased waste has been removed from the tank and processed in the plant refinery. The holding tank which had received the purchased light-ends is still in use. Light-ends generated from the Neville Island phthalic anhydride refinery are accumulated in this tank for less than 90 days prior to recycling.

We plan to proceed with the Pennsylvania DER in obtaining official closure of the storage activity. Please advise if additional information is required by your office.

Very truly yours

*A. A. Spinola*

A. A. Spinola  
Senior Environment Engineer

AAS:amh  
Attachment

MAR 8 1983

AIR, TOXICS AND HAZARDOUS  
MATERIALS DIVISION  
EPA REGION III

coded 33/OT - 3/11/83

BUREAU OF SOLID WASTE MANAGEMENT  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

ER-SWM-53: Rev. 3/82

<b>I INSTALLATION'S EPA I.D. NUMBER</b>														
P	A	D	0	0	0	8	2	4	7	3	0			
<b>II NAME OF INSTALLATION</b>														
USS CHEMICALS														
<b>III INSTALLATION MAILING ADDRESS</b>														
STREET OR P. O. BOX														
NEVILLE ISLAND PLANT														
CITY OR TOWN												ST.	ZIP CODE	
PITTSBURGH												P A	15225	
<b>IV LOCATION OF INSTALLATION</b>														
STREET OR ROUTE NUMBER												MUNICIPALITY		
SAME														
CITY OR TOWN										ST.	ZIP CODE	COUNTY		
SAME										P A	15225	ALLEGHENY		
<b>V INSTALLATION CONTACT</b>														
NAME AND TITLE (last, first, & job title)												PHONE NO. (area code & no.)		
SEROKIS, PETER M., PLANT MANAGER												4 1 2 7 7 1 6 2 0 0		
<b>VI OWNERSHIP</b>														
A. NAME OF INSTALLATION'S LEGAL OWNER														
UNITED STATES STEEL CORPORATION														
B. TYPE OF OWNERSHIP														
(enter the appropriate letter into box)														
F = FEDERAL    M = NON-FEDERAL <span style="border: 1px solid black; padding: 0 5px;">M</span>														
<b>VII SIC CODES (4-digit in order of priority)</b>														
A. FIRST										C. THIRD				
2 8 1 8 (specify) INDUSTRIAL ORGANIC CHEMICALS										(specify)				
B. SECOND										D. FOURTH				
(specify)										(specify)				
<b>VIII TYPE OF HAZARDOUS WASTE ACTIVITY</b>														
<input checked="" type="checkbox"/> A. GENERATION				<input type="checkbox"/> C. STORE				<input type="checkbox"/> E. TRANSPORTATION (COMPLETE ITEM IX)				<input checked="" type="checkbox"/> G. REUSE, RECYCLE, RECLAIM		
<input type="checkbox"/> B. TREAT				<input type="checkbox"/> D. DISPOSE				<input checked="" type="checkbox"/> F. PERMIT BY RULE				<input type="checkbox"/> H. OTHER (specify):		
<b>IX MODE OF TRANSPORTATION (transporters only)</b>														
<input type="checkbox"/> A. AIR <input type="checkbox"/> B. RAIL <input type="checkbox"/> C. HIGHWAY <input type="checkbox"/> D. WATER <input type="checkbox"/> E. OTHER (specify):														
<b>X EXISTING ENVIRONMENTAL PROGRAM PERMITS</b>														
A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)				
0 0 0 3 8 3 2														
B. UIC (Underground Injection of Fluids)										E. SOLID WASTE				
C. RCRA (Hazardous Wastes)										F. OTHER (specify)				
										SEE ATTACHED				
<b>XI. TYPE OF NOTIFICATION,</b>														
Mark "X" in appropriate box to indicate whether this is your installation's first notification of hazardous waste activity, or notification of a change of general information, hazardous waste handled, or hazardous waste activity. If you check B, C, D, E, or F, attach a letter of explanation (SEE INSTRUCTIONS).														
<input type="checkbox"/> A. FIRST NOTIFICATION					<input type="checkbox"/> C. DELETION OF A WASTE					<input checked="" type="checkbox"/> E. DELETION OF AN ACTIVITY				
<input type="checkbox"/> B. CHANGE OF GENERAL INFORMATION					<input type="checkbox"/> D. ADDITION OF A WASTE					<input type="checkbox"/> F. ADDITION OF AN ACTIVITY				

CONTINUE ON REVERSE

## XII DESCRIPTION OF HAZARDOUS WASTES (Continued from front)

**A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES.** Enter the four-digit number from §75.261(h)(2) for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1 F 0 0 1	2 F 0 0 2	3 D 0 0 1	4 D 0 0 2	5	6
7	8	9	10	11	12

**B. HAZARDOUS WASTES FROM SPECIFIC SOURCES.** Enter the four-digit number from §75.261(h)(3) each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13 K 0 2 3	14 K 0 2 4	15	16	17	18
19	20	21	22	23	24
25	26	27	28	29	30

**C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES.** Enter the four-digit number from §75.261(h)(4) for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31 U 0 3 1	32 U 1 6 6	33 U 1 4 7	34 U 1 6 5	35 U 0 2 8	36 U 1 9 0
37 U 0 6 9	38 U 0 1 9	39	40	41	42
43	44	45	46	47	48

**D. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES.** Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See §75.261(g)(2) through (5))

☐ 1. IGNITABLE

☐ 2. CORROSIVE

☐ 3. REACTIVE

☐ 4. EP TOXIC

## XIII CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

*P. X. Masciantonio*

NAME and OFFICIAL TITLE (Type or Print)

P. X. Masciantonio, Vice President  
Environment & Energy

DATE SIGNED

3-1-83

FOR OFFICIAL USE ONLY

FORM 1		U.S. ENVIRONMENTAL PROTECTION AGENCY		I. EPA I.D. NUMBER	
GENERAL		GENERAL INFORMATION		F P A D 0 0 0 8 2 4 7 3 0	
LABEL ITEMS		Consolidated Permits Program		(Read the "General Instructions" before starting.)	
I. EPA I.D. NUMBER	PLEASE PLACE LABEL IN THIS SPACE				
III. FACILITY NAME					
V. FACILITY MAILING ADDRESS					
VI. FACILITY LOCATION					

GENERAL INSTRUCTIONS

If a preprinted label has been provided, affix it in the designated space. Review the information carefully; if any of it is incorrect, cross through it and enter the correct data in the appropriate fill-in area below. Also, if any of the preprinted data is absent (the area to the left of the label space lists the information that should appear), please provide it in the proper fill-in area(s) below. If the label is complete and correct, you need not complete items I, III, V, and VI (except VI-B which must be completed regardless). Complete all items if no label has been provided. Refer to the instructions for detailed item descriptions and for the legal authorizations under which this data is collected.

## II. POLLUTANT CHARACTERISTICS

INSTRUCTIONS: Complete A through J to determine whether you need to submit any permit application forms to the EPA. If you answer "yes" to any questions, you must submit this form and the supplemental form listed in the parenthesis following the question. Mark "X" in the box in the third column if the supplemental form is attached. If you answer "no" to each question, you need not submit any of these forms. You may answer "no" if your activity is excluded from permit requirements; see Section C of the instructions. See also, Section D of the instructions for definitions of bold-faced terms.

SPECIFIC QUESTIONS	MARK 'X'			SPECIFIC QUESTIONS	MARK 'X'		
	YES	NO	FORM ATTACHED		YES	NO	FORM ATTACHED
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)		X	*	B. Does or will this facility (either existing or proposed) include a concentrated animal feeding operation or aquatic animal production facility which results in a discharge to waters of the U.S.? (FORM 2B)		X	*
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X		*	D. Is this a proposed facility (other than those described in A or B above) which will result in a discharge to waters of the U.S.? (FORM 2D)		X	
E. Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)		X	X	F. Do you or will you inject at this facility industrial or municipal effluent below the lowermost stratum containing, within one quarter mile of the well bore, underground sources of drinking water? (FORM 4)		X	*
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid hydrocarbons? (FORM 4)		X	*	H. Do you or will you inject at this facility fluids for special processes such as mining of sulfur by the Frasch process, solution mining of minerals, in situ combustion of fossil fuel, or recovery of geothermal energy? (FORM 4)		X	*
I. Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	*	J. Is this facility a proposed stationary source which is NOT one of the 28 industrial categories listed in the instructions and which will potentially emit 250 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an attainment area? (FORM 5)		X	*

## III. NAME OF FACILITY

1	SKIP	U S S C H E M I C A L S D I V I S I O N U S S T E E L
---	------	---

## IV. FACILITY CONTACT

A. NAME & TITLE (last, first, & title)		B. PHONE (area code & no.)	
2	S E R O K I S P P L A N T M A N A G E R	4 1 2	7 7 1 6 2 0 0

## V. FACILITY MAILING ADDRESS

A. STREET OR P.O. BOX		B. CITY OR TOWN		C. STATE	D. ZIP CODE
3	N E V I L L E I S L A N D P L A N T	4	N E V I L L E I S L A N D	P A	1 5 2 2 5

## VI. FACILITY LOCATION

A. STREET, ROUTE NO. OR OTHER SPECIFIC IDENTIFIER		B. COUNTY NAME		C. CITY OR TOWN		D. STATE	E. ZIP CODE	F. COUNTY CODE (if known)
5	N E V I L L E I S L A N D P L A N T	4	A L L E G H E N Y	6	N E V I L L E I S L A N D	P A	1 5 2 2 5	

### VIII. OPERATOR INFORMATION

F. CITY OR TOWN													G. STATE		H. ZIP CODE		IX. INDIAN LAND	
NEVILLE ISLAND													PA		1 5 2 2 5		Is the facility located on Indian lands?	
																	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

X. EXISTING ENVIRONMENTAL PERMITS															
A. NPDES (Discharges to Surface Water)										D. PSD (Air Emissions from Proposed Sources)					
C	T	I								C	T	I			
9	N		0	0	0	3	8	3	2	9	P				
15	16	17	18	30							15	16	17	18	30
B. UIC (Underground Injection of Fluids)										E. OTHER (specify)					
C	T	I								C	T	I			
9	U									9			SEE ATTACHED		
15	16	17	18	30							15	16	17	18	30
C. RCRA (Hazardous Wastes)										F. OTHER (specify)					
C	T	I								C	T	I			
9	R									9					
15	16	17	18	30							15	16	17	18	30

## XI. MAP

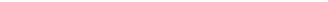
Attach to this application a topographic map of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing and proposed intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all springs, rivers and other surface water bodies in the map area. See instructions for precise requirements.

## XII. NATURE OF BUSINESS (provide a brief description) ▶

Manufacture of industrial organic chemicals specifically fumaric acid, maleic anhydride, phthalic anhydride, plasticizers and unsaturated polyester resins.

### XIII. CERTIFICATION (see instructions)

*I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those persons immediately responsible for obtaining the information contained in the application, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.*

<b>A. NAME &amp; OFFICIAL TITLE</b> <i>(type or print)</i> P. X. Masciantonio, Vice President Environment & Energy Department	<b>B. SIGNATURE</b> 	<b>C. DATE SIGNED</b> 1-17-83
---	---	----------------------------------

COMMENTS FOR OFFICIAL USE ONLY

PA. DEPARTMENT OF ENVIRONMENTAL RESOURCES  
BUREAU OF SOLID WASTE MANAGEMENT

## NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

Form ER-SWM-53: Rev. 3/82

Section X - Existing Environmental Program Permits

Part F - Other

Operating Permits Issued By: Allegheny County Health Department  
Bureau Of Air Pollution Control  
Allegheny County, Pennsylvania

<u>PERMIT NUMBER</u>	<u>EQUIPMENT</u>
7035003 013 00900	Steam Boiler
7035003 013 31300	Benzene Storage Tank
7035003 013 28700	Fumaric Acid Reactor
7035003 013 76201	Resin Plasticizer Production - Train No. 4
7035003 013 76202	Resin Plasticizer Production - Train No. 2
7035003 013 76203	Resin Plasticizer Production - Train No. 1
7035003 013 76204	Resin Plasticizer Production - Train No. 3
7035003 013 76205	Polyester Resins Plant
7035003 013 98600	Fluid Bed Chemical Reactor - Phthalic Anhydride
7035003 013 99701	Waste Gas Oxidizer - Maleic Anhydride No. 1,2,3
7035003 013 99702	Waste Gas Oxidizer - Maleic Anhydride No. 4

FORM  
1  
RCRA



U.S. ENVIRONMENTAL PROTECTION AGENCY  
**HAZARDOUS WASTE PERMIT APPLICATION**  
Consolidated Permits Program  
(This information is required under Section 3005 of RCRA.)

I. EPA I.D. NUMBER  
5  
P  
A  
D  
0  
0  
0  
8  
2  
4  
7  
3  
0  
T/A  
C  
1

FOR OFFICIAL USE ONLY  
APPLICATION APPROVED  
DATE RECEIVED (yr., mo., & day)  
23 24 29

COMMENTS

II. FIRST OR REVISED APPLICATION

Place an "X" in the appropriate box in A or B below (mark one box only) to indicate whether this is the first application you are submitting for your facility or a revised application. If this is your first application and you already know your facility's EPA I.D. Number, or if this is a revised application, enter your facility's EPA I.D. Number in Item I above.

A. FIRST APPLICATION (place an "X" below and provide the appropriate date)

1. EXISTING FACILITY (See instructions for definition of "existing" facility. Complete item below.)

2. NEW FACILITY (Complete item below.)

FOR EXISTING FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR THE DATE CONSTRUCTION COMMENCED (use the boxes to the left)

FOR NEW FACILITIES, PROVIDE THE DATE (yr., mo., & day) OPERATION BEGAN OR IS EXPECTED TO BEGIN

B. REVISED APPLICATION (place an "X" below and complete Item I above)

1. FACILITY HAS INTERIM STATUS

2. FACILITY HAS A RCRA PERMIT

III. PROCESSES - CODES AND DESIGN CAPACITIES

A. PROCESS CODE - Enter the code from the list of process codes below that best describes each process to be used at the facility. Ten lines are provided for entering codes. If more lines are needed, enter the code(s) in the space provided. If a process will be used that is not included in the list of codes below, then describe the process (including its design capacity) in the space provided on the form (Item III-C).

B. PROCESS DESIGN CAPACITY - For each code entered in column A enter the capacity of the process.

1. AMOUNT - Enter the amount.

2. UNIT OF MEASURE - For each amount entered in column B(1), enter the code from the list of unit measure codes below that describes the unit of measure used. Only the units of measure that are listed below should be used.

PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY	PROCESS	PRO- CESS CODE	APPROPRIATE UNITS OF MEASURE FOR PROCESS DESIGN CAPACITY
Storage:			Treatment:		
CONTAINER (barrel, drum, etc.)	S01	GALLONS OR LITERS	TANK	T01	GALLONS PER DAY OR LITERS PER DAY
TANK	S02	GALLONS OR LITERS	SURFACE IMPOUNDMENT	T02	GALLONS PER DAY OR LITERS PER DAY
WASTE PILE	S03	CUBIC YARDS OR CUBIC METERS	INCINERATOR	T03	TONS PER HOUR OR METRIC TONS PER HOUR; GALLONS PER HOUR OR LITERS PER HOUR
SURFACE IMPOUNDMENT	S04	GALLONS OR LITERS	OTHER (Use for physical, chemical, thermal or biological treatment processes not occurring in tanks, surface impoundments or incinerators. Describe the processes in the space provided; Item III-C.)	T04	GALLONS PER DAY OR LITERS PER DAY
Disposal:					
INJECTION WELL	D79	GALLONS OR LITERS			
LANDFILL	D80	ACRE-FEET (the volume that would cover one acre to a depth of one foot) OR HECTARE-METER			
LAND APPLICATION	D81	ACRES OR HECTARES			
OCEAN DISPOSAL	D82	GALLONS PER DAY OR LITERS PER DAY			
SURFACE IMPOUNDMENT	D83	GALLONS OR LITERS			
UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE	UNIT OF MEASURE	UNIT OF MEASURE CODE	UNIT OF MEASURE CODE
GALLONS	G	LITERS PER DAY	ACRE-FEET	A	
LITERS	L	TONS PER HOUR	HECTARE-METER	F	
CUBIC YARDS	Y	METRIC TONS PER HOUR	ACRES	B	
CUBIC METERS	C	GALLONS PER HOUR	HECTARES	Q	
GALLONS PER DAY	U	LITERS PER HOUR			

EXAMPLE FOR COMPLETING ITEM III (shown in line numbers X-1 and X-2 below): A facility has two storage tanks, one tank can hold 200 gallons and the other can hold 400 gallons. The facility also has an incinerator that can burn up to 20 gallons per hour.

DUP

LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY	LINE NUMBER	A. PRO- CESS CODE (from list above)	B. PROCESS DESIGN CAPACITY	FOR OFFICIAL USE ONLY
		1. AMOUNT (specify)	2. UNIT OF MEA- SURE (enter code)			1. AMOUNT	2. UNIT OF MEA- SURE (enter code)
1	S 0 2	600	G	5			
2	T 0 3	20	E	6			
3	S 0 2	0 *	G	7			
4				8			
				9			
				10			

**III. PROCESSES (continued)**

C. SPACE FOR ADDITIONAL PROCESS CODES OR DESCRIBING OTHER PROCESSES (code "T04") OR EACH PROCESS ENTERED HERE  
INCLUDE DESIGN CAPACITY.

**IV. DESCRIPTION OF HAZARDOUS WASTES**

**A. EPA HAZARDOUS WASTE NUMBER** — Enter the four-digit number from 40 CFR, Subpart D for each listed hazardous waste you will handle. If you handle hazardous wastes which are not listed in 40 CFR, Subpart D, enter the four-digit number(s) from 40 CFR, Subpart C that describes the characteristics and/or the toxic contaminants of those hazardous wastes.

**B. ESTIMATED ANNUAL QUANTITY** — For each listed waste entered in column A estimate the quantity of that waste that will be handled on an annual basis. For each characteristic or toxic contaminant entered in column A estimate the total annual quantity of all the non-listed waste(s) that will be handled which possess that characteristic or contaminant.

**C. UNIT OF MEASURE** — For each quantity entered in column B enter the unit of measure code. Units of measure which must be used and the appropriate codes are:

ENGLISH UNIT OF MEASURE                      CODE  
POUNDS . . . . . P  
TONS . . . . . T

METRIC UNIT OF MEASURE                      CODE  
KILOGRAMS . . . . . K  
METRIC TONS . . . . . M

If facility records use any other unit of measure for quantity, the units of measure must be converted into one of the required units of measure taking into account the appropriate density or specific gravity of the waste.

**D. PROCESSES****1. PROCESS CODES:**

**For listed hazardous waste:** For each listed hazardous waste entered in column A select the code(s) from the list of process codes contained in Item III to indicate how the waste will be stored, treated, and/or disposed of at the facility.

**For non-listed hazardous wastes:** For each characteristic or toxic contaminant entered in column A, select the code(s) from the list of process codes contained in Item III to indicate all the processes that will be used to store, treat, and/or dispose of all the non-listed hazardous wastes that possess that characteristic or toxic contaminant.

**Note:** Four spaces are provided for entering process codes. If more are needed: (1) Enter the first three as described above; (2) Enter "000" in the extreme right box of Item IV-D(1); and (3) Enter in the space provided on page 4, the line number and the additional code(s).

**2. PROCESS DESCRIPTION:** If a code is not listed for a process that will be used, describe the process in the space provided on the form.

**NOTE: HAZARDOUS WASTES DESCRIBED BY MORE THAN ONE EPA HAZARDOUS WASTE NUMBER** — Hazardous wastes that can be described by more than one EPA Hazardous Waste Number shall be described on the form as follows:

1. Select one of the EPA Hazardous Waste Numbers and enter it in column A. On the same line complete columns B, C, and D by estimating the total annual quantity of the waste and describing all the processes to be used to treat, store, and/or dispose of the waste.
2. In column A of the next line enter the other EPA Hazardous Waste Number that can be used to describe the waste. In column D(2) on that line enter "included with above" and make no other entries on that line.
3. Repeat step 2 for each other EPA Hazardous Waste Number that can be used to describe the hazardous waste.

**EXAMPLE FOR COMPLETING ITEM IV (shown in line numbers X-1, X-2, X-3, and X-4 below)** — A facility will treat and dispose of an estimated 900 pounds per year of chrome shavings from leather tanning and finishing operation. In addition, the facility will treat and dispose of three non-listed wastes. Two wastes are corrosive only and there will be an estimated 200 pounds per year of each waste. The other waste is corrosive and ignitable and there will be an estimated 100 pounds per year of that waste. Treatment will be in an incinerator and disposal will be in a landfill.

LINE NO.	A. EPA HAZARD. WASTE NO. (enter code)	B. ESTIMATED ANNUAL QUANTITY OF WASTE	C. UNIT OF MEA- SURE (enter code)	D. PROCESSES	
				1. PROCESS CODES (enter)	2. PROCESS DESCRIPTION (if a code is not entered in D(1))
X-1	K 0 5 4	900	P	T 0 3 D 8 0	
X-2	D 0 0 2	400	P	T 0 3 D 8 0	
X-3	D 0 0 1	100	P	T 0 3 D 8 0	
X-4	D 0 0 2				included with above

EPA Form 3510-3 (6-80)

**CONTINUE ON REVERSE**

(enter "A", "B", "C", etc. behind the "J" to identify photocopied pages)

**IV. DESCRIPTION OF HAZARDOUS WASTES (continued)****E. USE THIS SPACE TO LIST ADDITIONAL PROCESS CODES FROM ITEM D(1) ON PAGE**

EPA I.D. NO. (enter from page 1)

S	F	P	A	D	0	0	0	8	2	4	7	3	0	T/A	C	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

**V. FACILITY DRAWING**

All existing facilities must include in the space provided on page 5 a scale drawing of the facility (see instructions for more detail).

**VI. PHOTOGRAPHS**

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment and disposal areas; and sites of future storage, treatment or disposal areas (see instructions for more detail).

**VII. FACILITY GEOGRAPHIC LOCATION**

LATITUDE (degrees, minutes, &amp; seconds)

LONGITUDE (degrees, minutes, &amp; seconds)

4	0	3	0	0	0	0
55	56	57	58	59	60	61

8	0	0	5	0	0	0
72	73	74	75	76	77	78

**VIII. FACILITY OWNER**☒ A. If the facility owner is also the facility operator as listed in Section VIII on Form 1, "General Information", place an "X" in the box to the left and skip to Section IX below.

B. If the facility owner is not the facility operator as listed in Section VIII on Form 1, complete the following items:

1. NAME OF FACILITY'S LEGAL OWNER

2. PHONE NO. (area code &amp; no.)

17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	00	01	02	03	04	05	06	07	08	09	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31	32	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	51	52	53	54	55	56	57	58	59	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92
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U. S. ENVIRONMENTAL PROTECTION AGENCY  
CONSOLIDATED PERMITS PROGRAM  
GENERAL INFORMATION

Form 1 - General

Section X - Existing Environmental Permits

Part E - Other

Operating Permits Issued By: Allegheny County Health Department  
Bureau of Air Pollution Control  
Allegheny County, Pennsylvania

<u>PERMIT NUMBER</u>	<u>EQUIPMENT</u>
7035003 013 00900	Steam Boiler
7035003 013 31300	Benzene Storage Tank
7035003 013 28700	Fumaric Acid Reactor
7035003 013 76201	Resin Plasticizer Production - Train No. 4
7035003 013 76202	Resin Plasticizer Production - Train No. 2
7035003 013 76203	Resin Plasticizer Production - Train No. 1
7035003 013 76204	Resin Plasticizer Production - Train No. 3
7035003 013 76205	Polyester Resins Plant
7035003 013 98600	Fluid Bed Chemical Reactor - Phthalic Anhydride
7035003 013 99701	Waste Gas Oxidizer - Maleic Anhydride No.1,2,3
7035003 013 99702	Waste Gas Oxidizer - Maleic Anhydride No. 4

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region III - 6th & Walnut Sts.

Philadelphia, Pa. 19106

**SUBJECT:** RCRA Inspection - U.S. Steel Corp. - U.S.S.  
Chemical Co. - PAD 00 082 4730

**DATE:** NOV 22 1982

**FROM:** William L. Walsh  
Environmental Protection Assistant (3AW22) *WLW*

**TO:** File

**THRU:** Abraham Ferdas *AF*  
Chief, Air & RCRA Compliance Section (3AW22)

BASED UPON A REVIEW OF THE RCRA INSPECTION REPORT FOR THE FACILITY  
REFERENCED ABOVE, I HAVE DETERMINED THAT NO FURTHER ACTION IS  
REQUIRED AT THIS TIME.

<b>RECORD OF COMMUNICATION</b>		<input checked="" type="checkbox"/> PHONE CALL <input type="checkbox"/> DISCUSSION <input type="checkbox"/> FIELD TRIP <input type="checkbox"/> CONFERENCE <input type="checkbox"/> OTHER (SPECIFY)	
(Record of item checked above)			
<b>TO:</b> DAN PETERSON PA DER (412) 565-5023		<b>FROM:</b> BILL WALSH RCRA COMPLIANCE	
		<b>DATE</b> 11-22-82 <b>TIME</b> 8:10 AM	
<b>SUBJECT</b> follow up on 6-16-82 inspection of U.S.S. Chemical Co. (PAD 00 082)			
<b>SUMMARY OF COMMUNICATION</b> <div style="text-align: right;">4730)</div> <p style="margin-top: 20px;">           I asked Mr. Peterson if U.S.S. Chemical had corrected the problems found during his inspection. He stated that <del>the</del> the facility has told him by phone that they have come into compliance with all but one item - the containment structure. The company will be submitting their proposal to DER in the near future.         </p>			
<b>CONCLUSIONS, ACTION TAKEN OR REQUIRED</b>			
<b>INFORMATION COPIES</b> <b>TO:</b>			



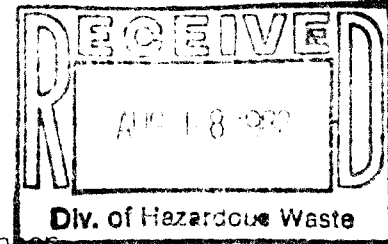
COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

Bureau of Solid Waste Management  
851 Kossman Building  
100 Forbes Avenue  
Pittsburgh, Pennsylvania 15222-1376 (412) 565-5023



August 13, 1982

United States Steel Chemical Company  
Neville Island Plant  
Neville Island, PA 15225



Attention: Eugene Fluharty, Environmental Engineer

Re: USS Chemical Company  
Neville Township  
Allegheny County  
ID No. PAD000824730

Dear Mr. Fluharty:

Enclosed are two copies each of your hazardous waste generator and TSD facility inspection reports. Please sign one copy of each and return them to my office.

Also enclosed is a copy of the Pennsylvania Department of Environmental Resources Hazardous Waste Rules and Regulations as you requested.

If you have any comments or questions, please contact me at the above address.

Sincerely,

Daniel F. Peterson  
Solid Waste Specialist  
Bureau of Solid Waste Management

DFP/jc

cc: ~~Central~~  
Regional  
Chron

HAZARDOUS WASTE INSPECTION REPORT  
TSD Facilities - Part A

CL 8-18-82

Date of inspection 16 June 82 Time start 1:30 Time finish 7:30  
Name of inspector D. Peterson, V. Ambrose, J. Shack  
Company, installation name U.S. Steel Chemical, Neville Island  
Location Neville Island  
County Allegheny Municipality Neville Island  
Identification number PAD 000 824 730  
Name of responsible official P.M. Serokis  
Title Plant Manager  
Mailing address Neville Island Plant, Neville Island, Pa 15225  
Area code and phone no. (412) 771-6200  
Name of person interviewed Eugene Flaherty, Jim Bishop  
Title Environmental Engineer, Chief Engineer  
Mailing address (if different from above) Same  
Area code and phone no. Same

1. Site characterization:

- a. ☐ Treatment - ☐ surface impoundments, ☐ chemical, ☐ physical, ☐ bio  
b. ☒ Storage - ☒ containers, ☒ tanks, ☐ surface impoundments, ☐ waste  
c. ☐ Disposal - ☐ land treatment, ☐ landfill, ☐ incineration, ☐ thermal  
d. ☐ Use ☐ reuse, ☐ recycle, ☐ reclaim

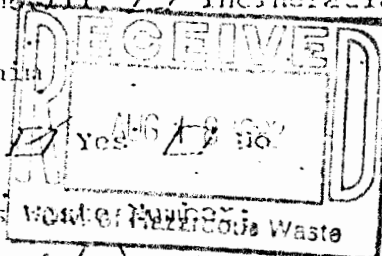
2. Does the facility generate hazardous wastes?

☒ Yes ☐ No

3. Types of hazardous waste produced by Hazardous Waste

See generator report (same date)

4. Are hazardous wastes transported off-site by the facility? ☒ Yes ☐ No



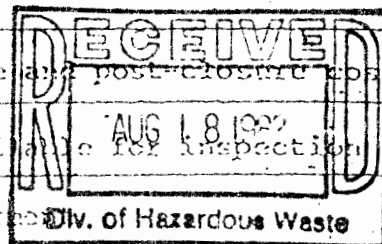
1-Non-Compliance, 2-Compliance, 3-Not Applicable, 4-Not

FINED

COMPLIANCE STATUS				REQUIREMENT	C C 7
1	2	3	4		
	✓			Part A permit application submitted	(a
	✓			Identification number	(
	✓			Wastes accepted at facility transported by haulers licensed to transport hazardous waste by the Department <i>Chemical Hauler</i>	(
		✓		Waste streams not covered by permit approved by the Department before acceptance	
	✓			<sup>HP</sup> Chemical and physical analyses repeated as required	
	✓			All waste shipments inspected and sampled	
	✓			Waste analysis plan on-site	
	✓			24 hr. surveillance at active portion	
	✓			Artificial barrier at active portion	
	✓			Proper signs posted and legible at a distance of at least 25 ft.	
	✓			Inspection schedule on-site	
	✓			Maintenance schedule on-site for equipment or structures which reveal deterioration or malfunction	
		✓		Immediate remedial action taken where a hazard is imminent or has already occurred	
	✓			On the job or classroom personnel training program <i>18198</i>	
	✓			Records retained for each employee at facility of training, job title, and job description <i>Div. of Hazardous Waste</i>	
		✓		Ignitable or reactive wastes separated from source of ignition or reaction	
	✓	✓		No smoking signs displayed where there are hazards from ignitable or reactive wastes	
		✓		Treatment, storage, disposal of ignitable or reactive wastes or mixing of incompatible wastes or materials conducted according to requirements	
	✓			Facility equipped with internal alarm system capable of providing immediate emergency instruction to personnel <i>Telephone, Alarm, 2 way Radio</i>	
	✓			<sup>Telephone</sup> Facility equipped with a device for summoning outside emergency assistance	
	✓			Facility equipped with fire control, spill control, and decontamination equipment	
		✓		Facility equipped with water at adequate volume and pressure to supply fire control equipment	
		✓		Facility communications or alarm system, fire control, spill control, and decontamination equipment tested and maintained	
		✓		Adequate aisle space maintained to allow unobstructed movement of personnel and equipment during emergencies <i>Turn only</i>	
	✓			Contingency plan on-site and implemented	

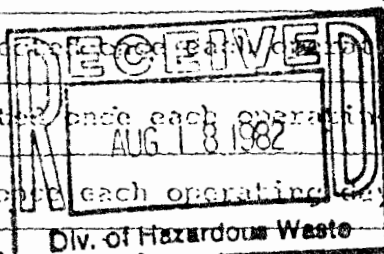
1-NON-COMPLIANCE, 2-COMPLIANCE, 3-NOT APPLICABLE, 4-NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CH. (17)
1	2	3	4		75
✓	✓			Contingency plan contains an up-to-date list of names, addresses, and phone numbers of all persons qualified to act as emergency coordinator. <sup>needs to include home address</sup>	(i)
	✓			Contingency plan contains list of emergency equipment including location, physical description and capabilities of each item	(i)
	✓			Contingency plan contains an evacuation plan if there is a possibility that evacuation could be necessary	(i)
	✓			One employee designated as the primary emergency coordinator either on the premises or on call.	(i)
	✓			Facility accepting only PA manifests	(j)
✓				Manifests properly completed and routed within time limits (24 hrs.)	(j)
	✓			Manifest discrepancies resolved or reported within time limits <sup>MIT Disposed</sup>	(j)
	✓			Written operating record maintained on the premises	(k)
	✓			Written operating record contains description and quantity of wastes and method of treatment, storage or disposal	(k)
	✓			Written operating record contains location and quantity of each hazardous waste	(k)
	✓			Written operating record contains results of waste analyses and treatability tests	(k)
	✓			Written operating record contains reports and details of all incidents	(k)
	✓			Written operating record contains records and results of all inspections	(k)
	✓			Written operating record contains required monitoring, testing, and analytical data	(k)
	✓			Written operating record contains closure and post-closure cost estimates	(k)
	✓			All records retained on premises and available for inspection	(k)
	✓			Quarterly reports submitted to the Department of Hazardous Waste	(k)
	✓			Emissions, discharges, fires, explosions, and groundwater contamination reported as required <sup>JAN 81</sup>	(k)
	✓			Groundwater monitoring wells located at approved sites	(k)
	✓			Adequate protection of groundwater monitoring wells	(k)
	✓			Groundwater sampling and analysis plan on the premises	(k)
	✓			Groundwater quality assessment and abatement outline on the premises	(k)
	✓			Closure plan on the premises and up-to-date	(k)
	✓			Post-closure plan on the premises and up-to-date	(k)
	✓			Annual closure cost estimate on the premises and up-to-date	(k)
	✓			Annual post-closure cost estimate on the premises and up-to-date	(k)



1-Non-Compliance, 2-Compliance, 3-Not Applicable, 4-Not Inspected

COMPLIANCE STATUS				REQUIREMENT	CIT.
1	2	3	4		
	✓			Containers managed to prevent leaks and spills	(g)
	✓			Containers are compatible with waste stored.	(g)
	✓			Containers are closed during storage	(g)
	✓			Container storage area inspected weekly for leaks, deterioration, etc.	(g)
	✓			Containers holding ignitable or reactive wastes are set back 15 m (50 ft) from property line.	(g)
	✓			Satisfactory procedures followed for handling incompatible wastes.	(c)
	✓			Incompatible wastes separated or protected from other materials.	(c)
	✓			Containers and tanks labeled to identify accurately hazardous waste contained.	(h) Section
	✓			Precautions taken for tanks holding ignitable, reactive, or incompatible waste or material	(i)
	✓			Tanks managed to prevent leaks, rupture, corrosion, or otherwise failing.	(j)
	✓			Uncovered tanks operated to ensure at least 60 cm (2 ft) of freeboard.	(k)
	✓			Uncovered tanks equipped with an overflow alarm and an overflow device to a standby tank with a capacity equal to or exceeding the freeboard requirement.	(l)
	✓			Continuously fed tanks equipped with a means to stop the inflow.	(m)
	✓			Containment structure with a capacity that equals or exceeds the largest above ground tank volume plus a reasonable allowance for precipitation based on local weather conditions and plant operations provided for liquid storage in above ground or partially above ground tanks.	(n)
	✓			Waste analyses and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated or stored; or chemically treat hazardous waste with a substantially different process than any previously used in that tank.	(o)
✓				Discharge control equipment inspected each operating day.	(p)
✓				Monitoring equipment data inspected once each operating day.	(q)
✓	✓			Liquid level of tanks inspected once each operating day.	(r)
✓				Construction materials of tanks inspected weekly.	(s)
	✓			Construction materials of discharge confinement structures and area immediately surrounding inspected weekly.	(t)
	✓			All hazardous waste removed from tanks and related appurtenances at closure.	(u)
	✓			Placement of ignitable or reactive waste only with the Department's approval.	(v)
	✓			Covered tanks in which ignitable or reactive waste is treated or stored meets 300 m buffer zone requirements.	(w)
	✓			Precautions taken for handling ignitable, reactive or incompatible waste	(x)



1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT A

COMPLIANCE  
 STATUS

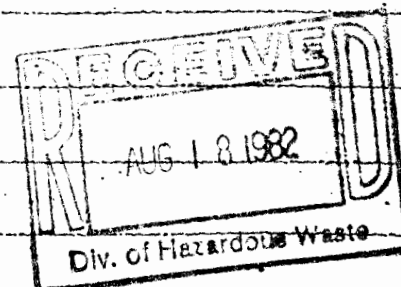
REQUIREMENT

1 2 3 4

✓				Precautions taken for treating ignitable, reactive, or incompatible waste or material.
✓				Treatment process or equipment managed to prevent leaks, rupture, corrosion, or otherwise failing.
	✓			Continuously fed treatment process or equipment equipped with a means to stop inflow.
	✓			Waste analysis and/or trial tests conducted on hazardous wastes substantially different from wastes previously treated in that process or equipment; or chemically treat hazardous waste with a substantially different process than any previously used in that process or equipment.
✓				Discharge control and safety equipment inspected once each operating day.
✓				Monitoring equipment data inspected once each operating day.
✓				Construction materials of treatment process or equipment inspected weekly.
		✓		Construction materials or discharge confinement structure and area immediate surrounding inspected weekly.
	✓			Closure requirements are complied with.
✓				Precautions taken for handling ignitable, reactive, or incompatible waste or material.

APR

1982



Date of inspection 16 June 82 Identification number PAD 000 824730  
Company, Installation name U.S. Steel Chemical Neville Plant  
County Allegheny Municipality Neville Island

\* Part A was amended to delete incineration.

\* Received a copy of Neville Island Plant

Preparedness, Prevention & Contingency Plan

Light ends of phthalic anhydride distillation purchased from Koppers, Bridgeville, KO23, which is stored for periods exceeding 90 days

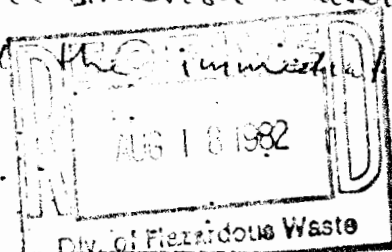
75.265 J(2) Manifests to USS Carrie furnace were not properly routed or completed.

75.265 (A)(1). A containment structure, whose capacity equals or exceeds the largest above ground tank must be provided for liquid storage tanks.

75.265 (2)(iv), (v)(i) Discharge control equipment must be inspected daily.

75.265 (4)(iii), The level of waste in each tank should be inspected daily.

75.265 (v)(2)(iv), (v), (v)(iii), (iv). The construction materials of the treatment process, and the immediate area must be inspected weekly.



This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were occurring during the inspection are indicated. Violations may also be discovered upon examination of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person interviewed (signature) \_\_\_\_\_

Date \_\_\_\_\_

Inspector (signature) \_\_\_\_\_

Donald F. Robinson

Date 7-28-82

HAZARDOUS WASTE INSPECTION REPORT  
Generators - Part A

70  
06.18.82

Date of inspection June 16, 1982 Time start 1:30 Time finish 4:30  
Name of inspector P. Peterson, K. Ambrose, J. Sheek  
Company, installation name US Steel Chemical, Neville Island  
Location Neville Island  
County Allegheny Municipality Neville Twp.  
Identification number PAD 000 824730  
Name of responsible official P. Serokis  
Title Plant Manager  
Mailing address USS Chemical Co, Neville Is Plant, Neville Island Pa 1522  
Area code and phone no. 412-771-6200  
Name of person interviewed Eugene Flaherty, Jim Bishop  
Title Environmental Engineer, Chief Engineer  
Mailing address (if different from above) same  
Area code and phone no. same

1. Current waste handling method:

- a. ☒ On-site ☒ treatment, ☒ storage, ☐ disposal  
b. ☒ On-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim  
c. ☐ Off-site ☐ treatment, ☐ storage, ☐ disposal  
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim
- primary neutralization*  
*K023 - From Koppers Bridgeville & used as a raw material after it is concentrated*

2. Amount of hazardous waste produced:

- a. \_\_\_\_\_ kg./mo. 480 T/yr  
b. \_\_\_\_\_ kg./yr.
- 4023 - purchased*

3. Types of hazardous waste produced by Hazardous Waste Number:

D002	Maleic Acid & Fumaric Acid	K023	U028	U013
K024	PA Distillation Bottoms,	U147	U228	
		U190	U022	

4. Are hazardous wastes transported off-site by the generator? ☐ Yes ☐ No

*Chemical Waste Mgmt. use Nitrox, Ohio drums, Mettack drums  
Chem-Bright, Milleson Environmental Systems.*

1- NON-COMPLIANCE, 2- COMPLIANCE, 3- NOT APPLICABLE, 4- NOT DETERMINED

COMPLIANCE STATUS				REQUIREMENT	CHAPTER CITATION
1	2	3	4		
	X			Identification number	(c) (1)
				Hazardous waste shipments offered only to licensed transporters	(c) (4)
	X			Authorization received from TSD facility for wastes shipped off-site	(d)
	X			PA manifest used for intrastate shipments	(e) (1)
	X			Disposer state manifest or EPA format manifest used for out-of-state shipments	(e) (1)
X				Manifests filled out properly and completely	(e) (1)
X				Manifests routed properly and within time limits (24 hours)	(e) (2)
	X			Proper U.S. DOT shipping containers or packages	(f) (1)
		X		Shipping containers marked and labeled according to U.S. DOT	(f) (1)
		X		Containers of 100 gal. or less marked with required PA label	(f) (1)
	X			Placards offered to transporter	(f) (2)
	X			Wastes accumulated on-site for less than 90 days TSD facility	(g) (1)
		X		Wastes stored in proper containers and properly marked and labeled	(g) (1)
	X			Containers managed in accordance with 75.265(g)	(g) (1)
	X			Containers clearly marked with accumulation date and visible for inspection	(g) (1)
	X			Records retained at designated location for 20 years	(h)
	X			Quarterly reports submitted to the Department	(i)
X				Exception reporting procedures followed	(j)
		X		Hazardous waste disposal plan, if required	(l)
X				Spill reporting procedures followed	(m)
	X			Preparedness, Prevention and Contingency Plan approved and implemented	(m)
		X		Special requirements followed for international shipments	(o)

reported to BSWQM  
11/18/82  
D.W. C. 11/18/82

HAZARDOUS WASTE INSPECTION REPORT  
Part C - Comments

Date of inspection 6-16-82 Identification number PAD 000 824 730  
Company, Installation name US Steel Chemical Co.  
County Allegheny Municipality North Twp.

75.262

(1) Chemical Waste Manifest listed as a transporter on 6-9-81  
Manifest - Actually CWM subcontracted Matlock to haul  
the waste material.

75.262 (2)

(5) Manifests stored at MID site were not returned  
within the proper time limits and an exception report  
was not filed.

(1) Spill reports concerning Hazardous Waste should  
be submitted to the Bureau of Solid Waste Management  
as well as the Bureau of Water Quality Management.

- Part A amended to delete incineration

Transporters: PAT 000 621 839 PAD 000 436 0  
PAD 000 434 738 PAD 0300 632 4  
PAT 440 013 613 OH 075 006 80  
PAD 088915 822 NYD 088658 64



This inspection report is official notification that a representative of the Department of Environmental Resources, Bureau of Solid Waste Management, inspected the above installation. The findings of this inspection are shown in this report. Any violations which were uncovered during the inspection are indicated. Violations may also be discovered upon examination of results of laboratory analyses and review of Department records. Notification will be forthcoming, confirming any violations indicated herein and listing any additional violations.

Person Interviewed (signature) \_\_\_\_\_ Date \_\_\_\_\_

Inspector (signature) Daniel Peterson Date 7-28-82